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February 27, 2011

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S. W.  
Suite TW-A325  
Washington, D.C. 20554

Re: Certification of CPNI Filing for Year 2011  
EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's rules, is a compliance certificate and accompanying statement for the year ended December 31, 2011 for TVC Albany, Inc. doing business as Tech Valley Communications.

The company's FCC Form 499 Filer ID is 822400.

Should you have any questions regarding my response, please call me at (518) 598-0900 or by email at [koconnor@techvalleycom.com](mailto:koconnor@techvalleycom.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin O'Connor", written over a horizontal line.

Kevin O'Connor  
Chief Executive Officer

attach.

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

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## **Statement**

TVC Albany, Inc., doing business as Tech Valley Communications ("Tech Valley") has established a procedure to protect Customer Proprietary Network Information ("CPNI"). The Tech Valley Procedure:

- States that the policy of Tech Valley is that "CPNI will not be used for the purpose of marketing services, other than by Tech Valley when marketing Tech Valley Services to a Tech Valley customer"
- Tech Valley continually educates and trains its employees regarding the appropriate use of CPNI and has established disciplinary procedures should an employee violate the CPNI procedure established by Tech Valley
- Tech Valley maintains a record of its sales and marketing campaigns. No CPNI information has been used in these sales and marketing campaigns. Tech Valley's policy is that "Tech Valley will not use CPNI in any sales or marketing campaign"
- To Tech Valley's knowledge, no Tech Valley CPNI has been obtained by any data broker in 2011 nor by any other third party. Tech Valley is not aware of any unauthorized release of CPNI and no customer of Tech Valley has complained regarding unauthorized disclosure of CPNI.

- The following is information Tech Valley has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps are taking to protect CPNI:
  - To my knowledge, no pretexter has attempted to obtain CPNI from Tech Valley
- The following is a summary of all customer complaints received in 2011 regarding unauthorized release of CPNI
  - Number of customer complaints Tech Valley received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None
  - **Category of complaints:**
    - Number of instances of improper access by employees: Zero
    - Number of instances of improper disclosure to individuals not authorized to receive the information: Zero
    - Number of instances of improper access to online information by individuals not authorized to view the information: Zero
    - Number of other instances of improper access or disclosure: Zero
  - **Description of instances of customer complaints, improper access or disclosure:** Not Applicable
- Tech Valley's Chief Technology Officer provides advice and counsel regarding compliance with the CPNI rules

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## **Certification**

I, Kevin O'Connor, hereby certify this 27<sup>th</sup> day of February, 2012 that I am an officer of TVC Albany, Inc., doing business as Tech Valley Communications, that I am acting as an agent of this company, and that I have personal knowledge that Tech Valley Communications has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C. F. R. §§ 64 2001-2011. Attached to this certification is an accompanying statement explaining how this company's procedures ensure compliance with the Commission's rules.

A handwritten signature in black ink, appearing to read "Kevin O'Connor", is written over a horizontal line.

Kevin O'Connor  
Chief Executive Officer